

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

Crim. No. 23-10079-FDS

SAMUEL MONTRONDE

**Defendant Samuel Montronde's
Motion to Continue Trial**

Now comes defendant Samuel Montronde, by and through undersigned counsel, and hereby moves to continue the trial date, currently scheduled for December 2, 2024, to a reasonable date convenient for the Court and the parties that allows for litigating necessary pretrial issues. As grounds for this motion, Mr. Montronde's counsel states as follows:

1. The Government has listed co-defendant Priya Bhambi as a trial witness. ECF No. 139).
2. I have inquired of the Government if they truly expect Ms. Bhambi to testify. They will not rule her out as a witness and state she is on their witness list.
3. Ms. Bhambi's defense counsel has always been forthcoming in sharing that he did not believe she would testify. His position has not changed.
4. Thus, Priya Bhambi's appearance on the Government witness list was unanticipated.
5. As the Court will be aware from the filings regarding her sentencing, Ms. Bhambi has undergone extensive psychological testing. Further the redacted report indicates other prior counseling or coaching Ms. Bhambi has received. (See ECF No. 130).
6. In order to effectively cross examine Ms. Bhambi, defense counsel would need to acquire these records. Given that the many, if not all, of

the records are presumptively privileged, access to them would have to be litigated.

7. It would be impossible to accomplish this in advance of the December 2, 2024 trial date. The case is document-heavy and counsel is already attempting to review some 149,000 entries on Ms. Bhambi's phone and phone apps. There are more than 38,000 bates stamped records to be familiar with for trial.

The defendant therefore requests that the trial be continued to a date that is convenient for the Court and allows for litigation regarding counseling records. For the reasons stated herein, the defendant agrees to exclude from all calculations under the Speedy Trial Act all time from the date of this motion to and including the new date for the trial, pursuant to 18 U.S.C. § 3161(h)(8)(A).

SAMUEL MONTRONDE

By his attorney,

/s/ Mark W. Shea
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Dated: November 20, 2024

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 20, 2024.

/s/ Mark W. Shea
MARK W. SHEA